

ROPES & GRAY LLP
Martin J. Crisp
Andrew G. Devore
1211 Avenue of the Americas
New York, New York 10036
(212) 596-9193

*Counsel for Defendant Schroder & Co.
Bank AG*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff,

Plaintiff,

v.

SCHRODER & CO. BANK AG,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 12-01210 (CGM)

ORAL ARGUMENT REQUESTED

NOTICE OF SCHRODER & CO. BANK AG'S MOTION TO DISMISS

PLEASE TAKE NOTICE that, on March 11, 2022, Schroder & Co. Bank AG (“Defendant”), filed its Motion to Dismiss the Complaint (the “Motion”) pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012 of the Federal Rules of Bankruptcy Procedure, in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion will be held on a date to be determined in the courtroom of the Honorable Cecelia G. Morris, United States Bankruptcy Judge.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order entered on February 22, 2022, oppositions to the Motion, if any, shall be filed by Wednesday, May 11, 2022, and replies in further support of the Motion shall be filed by Monday, June 13, 2022.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Defendant does not consent to the entry of final orders or judgment by this Court.

Dated: March 11, 2022
New York, New York

ROPES & GRAY LLP

/s/ Martin J. Crisp

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